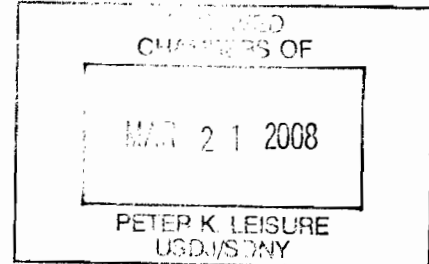
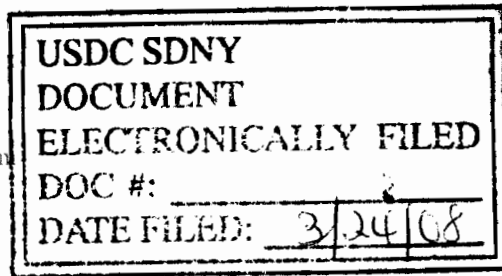


COHEN & GRESSER LLP

## MEMO ENDORSED

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March 21, 2008

BY HAND

Honorable Peter K. Leisure  
United States District Court  
Southern District of New York  
500 Pearl Street, Room 1040  
New York, New York 10007

Re: Navigant Consulting, Inc. v. Varughese, No. 07 CV 4854 (PKL)

Dear Judge Leisure:

We represent Defendant-Counterplaintiff Jess Varughese in the above-referenced action. There is a companion to this case being litigated in the Eastern District of New York under the caption *Navigant Consulting, Inc. v. Kostakis*, No. 07-2303 (CPS). The parties have pursued discovery in both actions on a consolidated basis.

At the request of counsel for Plaintiff-Counterdefendant Navigant Consulting, Inc., we submit this letter jointly with counsel for Navigant to request that the deadline for exchange of expert reports be extended from the current April 4, 2008 deadline. The parties request that the expert discovery schedule in this action be amended to conform to the proposed schedule set forth below, which was adopted in the *Kostakis* matter on March 19 by Magistrate Judge Azrack of the Eastern District. No prior extensions have been made by this Court.

The parties believe it will be more productive for any expert witness to render a report after the close of fact discovery on May 15, rather than possibly revise a report based upon information disclosed after April 4.

The parties have agreed to the following schedule:

- June 2: Disclosure of identity and resume of any expert witness offered in support of a party-proponent due
- June 16: Reports from party-proponent experts due

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June 30: Last date for depositions of party-proponent expert witnesses  
July 18: Rebuttal expert witnesses to be identified and reports due  
August 8: Last day for deposition of rebuttal expert witnesses

We thank the Court for its assistance with this matter.

Respectfully submitted,



Nathaniel P. T. Read (NR 8807)

*Counsel for Defendant and Counterclaim  
Plaintiff Jess Varughese*

cc: Amy P. Purcell, Esq. (via e-mail)  
Michael C. Conway, Esq. (via e-mail)  
Robert Scher, Esq. (via e-mail)  
Foley & Lardner LLP  
*Counsel for Plaintiff and Counterclaim Defendant Navigant Consulting*

